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_____ Spring _____ Summer _____ Fall _____ Winter _____ X

(Conspiracy to Violate the Mann Act)

2. DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, communicated with the clients of his prostitution business by email to coordinate the prostitution services, which included sending

photos to clients of women who were available for hire for prostitution services, discussing the price of prostitution services, and overseeing travel logistics for women to travel to engage in prostitution. At times, JORDAN himself arranged the interstate travel for the women to engage in prostitution, and at other times clients, at JORDAN's direction, arranged the interstate travel for the women whom JORDAN directed to those clients. In addition, to facilitate his prostitution business, JORDAN coordinated with a United Kingdom-based madam("CC-1") by sharing and referring customers and prostitutes with CC-1.

3. DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, primarily managed the finances of the prostitution business through two front companies incorporated in California, including a purported party and event planning company ("Company-1") and movie production company ("Company-2"). JORDAN opened multiple bank accounts in the name of Company-1 and Company-2, which he used to accept cash, wire, and check payments for prostitution services from clients and to pay for the expenses of the prostitution business, including paying the women for their prostitution services by cash and check. At times, JORDAN further disguised the nature of the check payments made to the women for their prostitution services by describing them as modeling fees, appearances fees, consulting fees, massage

therapy fees, and house party fees, among other things. By depositing and causing others to deposit the proceeds of his prostitution business into Company-1 and Company-2, JORDAN ensured that transactions involving those proceeds would disguise the nature, source, and origin of those funds.

Statutory Allegations

4. From at least in or about 2010, up to and including at least in or about May 2017, in the Southern District of New York and elsewhere, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, and others known and unknown, willfully, and knowingly did combine, conspire, confederate, and agree together and with each toher to commit an offense against the United States, to wit, to violate Sections 2421 and 2422(a) of Title 18, United States Code.

5. It was a part and an object of the conspiracy that DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, and others known and unknown, would and did knowingly transport individuals in interstate and foreign commerce, with the intent that such individuals engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421.

6. It was a further part and an object of the conspiracy that DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice

Hatton, a/k/a Daniel Bohler, the defendant, and others known and unknown, would and did knowingly persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce, to engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(a).

Overt Acts

7. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 28, 2011, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, confirmed in an email to a client co-conspirator not named as a defendant in this Indictment ("CC-2") that CC-2 should deposit payment for prostitution services into a bank account held by Company-1.

b. On or about December 15, 2011, at JORDAN's direction, CC-2 booked a hotel in Manhattan and a flight from California to New York for a victim ("Victim-1") hired through DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, for the purpose of engaging in prostitution in Manhattan.

c. On or about June 26, 2016, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, booked a flight from California to New York for a victim ("Victim-2") to travel to New York for the purpose of engaging in prostitution in Manhattan between on or about June 27 and 28, 2016.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Enticement)

The Grand Jury further charges:

8. In or about December 2011, in the Southern District of New York and elsewhere, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, did knowingly persuade, induce, entice and coerce an individual to travel in interstate and foreign commerce, with the intent that the individual engage in prostitution, and in any sexual activity for which a person can be charged with a criminal offense, to wit, JORDAN recruited and directed Victim-1 to travel in interstate commerce to the Southern District of New York, to engage in prostitution between in or about December 19 and 21, 2011.

(Title 18, United States Code, Sections 2422(a) and 2.)

COUNT THREE

(Use of Interstate Commerce to Promote Unlawful Activity)

The Grand Jury further charges:

9. From at least in or about 2010, up to and including at least in or about May 2017, in the Southern District of New York and elsewhere, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, did use and cause to be used facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, to wit, JORDAN used email and the Internet to promote, manage, establish, and carry on a criminal business enterprise engaged in promoting prostitution, in violation of New York Penal Law §§ 230.20 and 230.25.

(Title 18, United States Code, Sections 1952(a)(3) and 2.)

COUNT FOUR

(Concealment Money Laundering)

The Grand Jury further charges:

10. From at least in or about 2010, up to and including at least in or about May 2017, in the Southern District of New York and elsewhere, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel

Maurice Hatton, a/k/a Daniel Bohler, the defendant, knowing that the property involved in certain financial transactions, to wit cash transactions, wire transfers, and check payments, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity as defined in Title 18, United States Code, Section 1956(c)(7)(A), to wit, transportation for illegal sexual activity, in violation of Title 18, United States Code, Sections 2241 and 2242, and use of interstate commerce to promote unlawful activity, in violation of Title 18, United States Code, Section 1952, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity.

(Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.)

FORFEITURE ALLEGATIONS

11. As a result of committing the offenses alleged in Counts One and Two of this Indictment, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said

offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitation the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and proceeds traceable to the commission of said offense.

12. As a result of committing the offense alleged in Count Three of this Indictment, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real or personal, constituting or derived from any proceeds traceable to the commission of said offense.

13. As a result of committing the offense alleged in Count Four of this Indictment, DILLON JORDAN, a/k/a Daniel Jordan, a/k/a Daniel Maurice Hatton, a/k/a Daniel Bohler, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Asset Provision

14. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;


(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, and 2428; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


FOREPERSON


AUDREY STRAUSS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

DILLON JORDAN,

a/k/a Daniel Jordan,
a/k/a Daniel Maurice Hatton,
a/k/a Daniel Bohler,

Defendant.

SEALED INDICTMENT

21 Cr. ____ (____)

(18 U.S.C. §§ 371, 2422(a), 1952(a)(3),
1956(a)(1)(B)(i), and 2.)

AUDREY STRAUSS

United States Attorney


Foreperson

Sealed Indictment

6/24/21
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Stewart D. Aran
U.S.M.J.